



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

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ATTORNEY GENERAL

DIVISION OF STATE COUNSEL
LITIGATION BUREAU

July 19, 2019

VIA ECF

Honorable Sarah Netburn
United States Magistrate Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Common Cause/New York v. Brehm, et al., 17 Civ. 6770 (AJN)(SN)

Dear Judge Netburn:

I write on behalf of non-party New York State Office of the Attorney General ("OAG") pursuant to the Court's July 15, 2019 Order whereby the OAG was directed to provide its "final position regarding the redaction of voter's identifying information in its subpoena responses." ECF No. 107. The OAG is willing to produce unredacted materials contingent upon the parties entering into a stipulation of confidentiality and protective order regarding the access to and dissemination of voter's identifying information. Plaintiff's and Defendants' counsel consent to this proposal. To that end, we anticipate circulating a proposed stipulation of confidentiality and protective order to the parties shortly. Once that is in place, we will reproduce the materials in unredacted form under a mark of "Confidential."

Thank you for your consideration.

Respectfully submitted,
/s/ James B. Cooney
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cc: Counsel of Record (via ECF)